

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.
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Case No.: 1:22-cv-1032 (PKC)(JRC)

**DECLARATION OF
SAFA A. GELARDI**

SAFA A. GELARDI, hereby declares and verifies the truth of the following, under penalty of perjury under the laws of the United States of America, pursuant to Title 28, United States Code, Section 1746:

1. I am a defendant in the above-captioned matter and the Chief Executive Officer of the now defunct defendant IME Companions LLC (“IME Companions”), and I am fully familiar with the facts set forth herein. I make this declaration in opposition to plaintiff’s latest contempt motion (288).

2. I categorically deny all of plaintiff’s hearsay and inadmissible allegations of contempt.

3. Neither I nor IME Companions has violated any Court Order. We have not serviced any law firm on the “Enjoined Customer List” since we were ordered not to do so. We have not serviced The Gucciardo Law Firm PLLC in violation of any Court Order. We have not serviced Subin Associates, LLP in violation of any Court Order. We have not serviced Bergman, Bergman, Fields & Lamonsoff in violation of any Court Order. We have not serviced Ginarte Gonzalez &

Winograd LLP in violation of any Court Order. We have not serviced Zemsky & Salomon P.C. in violation of any Court Order.

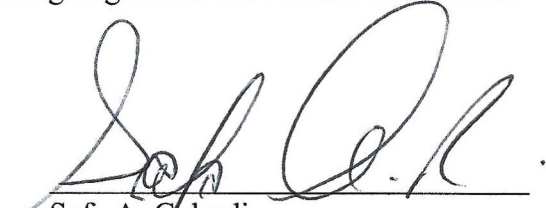
4. Nor have we serviced any law firm on the Enjoined Customer List through any alleged “alter ego” company.

5. Client Exam Services (“CES”) was not an “alter ego” company used by me to circumvent any Court Order. I was not a member of CES. I was not a manager of CES. I had no ownership interest in CES. I was not involved with the day-to-day operations of CES. I did not profit from CES. CES did not pay me dime one for any of the IME observation jobs it did for any law firm.

6. IME Legal Reps (“Legal Reps”) is not an “alter ego” company used by me to circumvent any Court Order. I am not a member of Legal Reps. I am not a manager of Legal Reps. I have no ownership interest in Legal Reps. I am not involved with the day-to-day operations of Legal Reps. I have not profited from Legal Reps. Legal Reps does not pay me for any of the IME observation jobs it does for any law firm.

7. That I assisted with the migration of the IME Companions website domain to Eugene Liddie after he purchased the website does not mean that Mr. Liddie’s newly-formed company is my “alter ego” as plaintiff asserts. The inadmissible emails from Giants Partners prove only that IME Companions had a pre-existing digital marketing agreement with Giant Partners and that my assistance was needed in connection with the migration of the website to Mr. Liddie for Legal Reps. For example, I needed to provide Go Daddy credentials to Giant Partners to fix problems that Mr. Liddie was having with his new website, and I made suggestions to help ensure that Legal Reps could not be confused with IME Companions.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
May 10, 2024.



Safa A. Gelardi